

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,
Plaintiff,

v.

No. 25-CR-8

SHELTON K. THORNTON, *et al.*,
Defendants.

DEFENDANT'S MOTION TO MODIFY BOND CONDITIONS

Shelton Thornton, by counsel, asks the Court to modify the conditions of his bond to remove GPS monitoring. Neither of his assigned pretrial services officers (one in Colorado, one in Wisconsin) opposes this motion. Additionally, Counsel for Thornton has spoken with Assistant United States Attorney Katherine Halopka-Ivery about this motion, and she does not take a position. In support of this motion, Thornton asserts the following:

1. On May 5, 2025, the Court issued an order setting Thornton's conditions of release. ECF 69.
2. As a condition of his release, the Court required Thornton to participate in Stand Alone Monitoring with GPS monitoring. *Id.* at 2, 3.
3. Thornton, since a car accident, uses a wheelchair but is able to ambulate without it.

4. Thornton has previously participated in water therapy to improve his ability to walk without his wheelchair.

5. Thornton's physical therapist agrees that water therapy could potentially be beneficial.

6. Thornton's counsel spoke with Colorado District Court Pretrial Services Officer Seth Junker about a motion to remove Thornton from GPS monitoring. Junker said that, given Thornton's lower risk level and compliance, he would not oppose removing the condition if the pretrial services officer in the Eastern District of Wisconsin also did not oppose it.

7. Thornton's counsel spoke with Eastern District of Wisconsin Pretrial Services Officer Joseph Werner about a motion to remove Thornton from GPS monitoring. Officer Werner said he does not object to the removal of location monitoring.

8. Thornton's counsel spoke with the AUSA Halopka-Ivery about a motion to remove Thornton from GPS monitoring. AUSA Halopka-Ivery said she does not take a position on the motion.

WHEREFORE, Shelton Thornton respectfully requests modification of his bond conditions.

Dated at Madison, Wisconsin, August 15, 2025,

Respectfully submitted,

SHELTON K. THORNTON, *Defendant*

/s/ John H. Bradley

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